

**From:** [ROYER David \(AREVA\)](#)  
**To:** [Siurano-Perez, Osiris](#)  
**Cc:** [Grice, Thomas](#); [PETERS Gary \(AREVA\)](#); [ELLIOTT Gayle \(AREVA\)](#)  
**Subject:** [External\_Sender] FW: AREVA LTA  
**Date:** Tuesday, September 13, 2016 11:56:50 AM  
**Attachments:** [image003.png](#)

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Hello Osiris,

FYI regarding financial review. Thomas asked that I keep you in the loop.

These are clarifications I provided to Ken. We certainly hope that the financial review is an easy task given the nature of the license and the context.

Please let me know if you need any more information.

David

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**From:** ROYER David (CORP-NP)  
**Sent:** Sunday, September 04, 2016 1:34 PM  
**To:** 'Kenneth.Kline@nrc.gov'  
**Cc:** PETERS Gary (DTI); ELLIOTT Gayle (DTI); [craig.erlanger@nrc.gov](mailto:craig.erlanger@nrc.gov)  
**Subject:** AREVA LTA

Dear Ken,

Further to your conversation with Gayle Elliott as related to me below in her email, I am responding to your request for additional information and clarification for our License Transfer Application which you are currently reviewing. We appreciate your time and hope that this response will help in making your review somewhat easier.

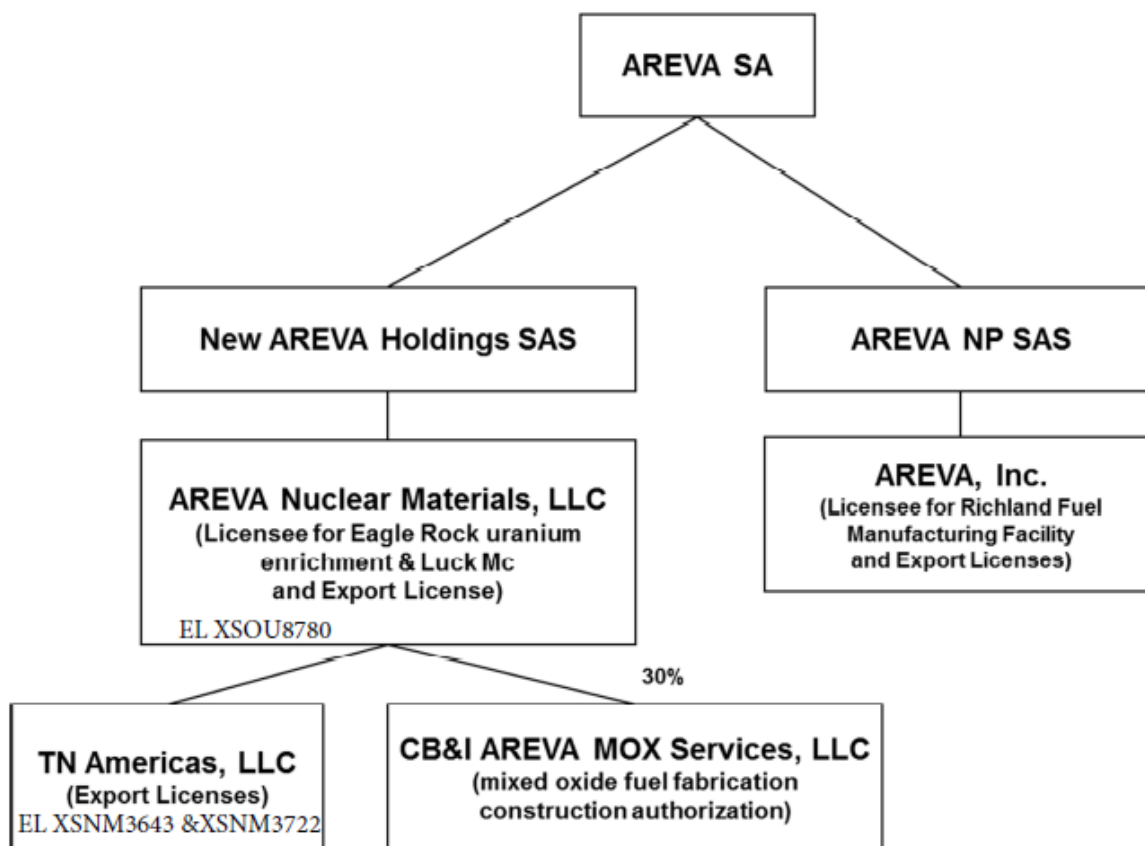
- 1) Export Licenses - Per your request, I have inserted the pertinent Export License numbers that are being transferred on the Org Chart below. Note that other Export License referred to in the LTA are NOT being transferred, but will remain with AREVA Inc..
- 2) Reference to PMC –All AREVA implicated companies (transferor and transferees) are shown on the Org Chart included with the LTA. PMC, which was sold to UR Energy, a non AREVA company, in 2013, is no longer an AREVA company and, therefore, does not appear on the Org Chart. As discussed in section I.C. of the LTA, PMC is only mentioned to provide historical context for the Lucky Mc license.
- 3) NUREG 1556 financial information – We do not think that this regulation is applicable to the Eagle Rock license transfer. There has been no facility constructed under the license, and financial information is not necessary for the license transfer review, because financial qualifications are addressed prospectively in License Condition 21 of SNM-2015. This license condition prescribes the information that must be provided prior to constructing the facility, as well as the timing for providing that information. For now, we only have a license to construct.
- 4) AREVA Enrichment Services LLC (AES) – As described in the LTA, AES will change its name to AREVA Nuclear Materials LLC (ANM) and ownership of ANM will change from AREVA Inc. to New AREVA Holdings SAS. However, AREVA Inc. and ANM will continue to have the same ultimate parent company AREVA SA. This is an indirect transfer of control for which NRC consent is sought.

We trust this information is helpful. Should you have any questions or concerns, please do not hesitate to call me directly on my mobile number.

Kind regards,

David Royer

Mobile – 434 841 3218



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**From:** ELLIOTT Gayle (DTI)  
**Sent:** Friday, September 02, 2016 3:29 PM  
**To:** ROYER David (CORP-NP)  
**Subject:** NRC Phone Call

Kenneth Kline from the NRC called to request some clarifications on the AREVA reorg letter that we submitted to them. He is working on the public notice in Osiris's absence.

1. Ken requested that the export license numbers be placed on the org charts.
  2. There is reference to names of several companies (such as PMC) on the last page of the submittal that are not on the org chart. Ken requested an org chart of all companies be provided.
  3. Ken stated that we referenced NUREG 1556 (which is good) but also noted that RIS 2008-19 recommends providing the draft financial instruments before the license is transferred. He is willing to review the instruments. He stated anytime there is a change in the financial position of a company that the last 2 years of operation and a projection of 5 years after the transaction be included (page 5 of 7 of RIS – attached). Note that the RIS is for recommendation – not a requirement.
  4. Ken wanted clarification that AES was going to be renamed AREVA Nuclear Materials and that there is no corporate structure change. I did not provide any clarification on this point. Ken's email is [Kenneth.Kline@nrc.gov](mailto:Kenneth.Kline@nrc.gov). His phone number is (301) 415-7075.
- Gayle

<RIS 2008-19.pdf>

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